

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-125-E

IN RE:)	Dominion Energy South Carolina,
Application of Dominion Energy South)	Inc.'s Second Set of Discovery Requests
Carolina, Incorporated for Adjustment of)	to the South Carolina Energy
Rates and Charges)	Users Committee
_____)	

Pursuant to South Carolina Regulation 103-833, Dominion Energy of South Carolina, Inc. ("DESC") respectfully submits its Second Set of Written Interrogatories and Requests for Production of Documents and Things to South Carolina Energy Users Committee.

Instructions

1. Responses should be provided within 20 days in writing and under oath, as specified in Regulation 103-833.
2. These requests are continuing in nature and require you to supplement or amend your answer in a timely manner if you learn that the answer is incorrect or incomplete or if you identify additional documents or information responsive to the request.
3. Where knowledge, information, or documents are requested, such request encompasses knowledge, information, or documents in your possession, custody, or control, or in the possession, custody, or control of your staff, agents, employees, representatives, expert witnesses and consultants, and, unless privileged, attorneys.

4. If you object to a portion of any request, state the grounds of your objection with specificity and answer the remainder of the request. Objections on account of vagueness should specifically explain why you believe the request is vague and should state your understanding of the information being sought along with a response consistent with your understanding.

5. For every page produced to DESC that contains confidential information, the page is to be marked "CONFIDENTIAL" in the header. Any specific information which you designate as confidential information must also be marked by notation, highlighting, or other conspicuous means.

6. "Party" is defined as the South Carolina Energy Users Committee.

Document and Information Requests

DESC 1-12. Please provide all reports and studies Mr. McGavran has authored related to the following:

- Designing transmission systems;
- Operating transmission systems; and
- Performing transmission planning studies.

DESC 1-13. Please provide copies of all source documents, articles, regulatory decisions, work papers, and other sources supporting Mr. McGavran's contention that a transmission line's capacity is a relevant consideration in planning or determining the need or utility of transmission assets.

DESC 1-14. Please provide copies of all reports, studies, analyses or other data either authored by Mr. McGavran or others in which a proposed transmission line's low anticipated capacity factor was cited as a relevant planning criterion.

DESC 1-15. Please provide copies of all reports, studies, analyses or other data either authored by Mr. McGavran or others in which a proposed transmission line's low anticipated capacity factor was cited as a reason for not constructing that transmission line or finding it not to be useful.

DESC 1-16. Please provide copies of all source documents, articles, regulatory decisions, work papers, and other sources Mr. McGavran believes support his contention that a transmission asset's capacity factor is a relevant indicator of its value to system reliability.

DESC 1-17. Please provide copies of all documentation in support of Mr. McGavran's statement that "VCSN 2 and 3 provided 75% of the justification for the construction of the VCS1—Killian 230 kV project" as stated in his pre-filed direct testimony on page 13.

DESC 1-18. Is it Mr. McGavran's contention that the high capacity transmission path into the Killian 230 kV substation provided by the VCS1—Killian 230 kV line provides no system benefit to DESC and its customers? If so, please provide all facts, data, and analysis supporting this contention.

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Respectfully submitted,

____s/Belton T. Zeigler

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December 15, 2020
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-125-E

IN RE:)	
Application of Dominion Energy South)	
Carolina, Incorporated for Adjustment of)	CERTIFICATE OF SERVICE
Rates and Charges)	

This is to certify that I have this date caused to be served one (1) copy of **Dominion Energy South Carolina, Inc.’s Second Discovery Requests to South Carolina Energy Users Committee** on behalf of Dominion Energy South Carolina, Inc. in the above-referenced matter upon the persons named below via electronic mail:

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December 15, 2020
Columbia, South Carolina

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_____/s/ Kathryn S. Mansfield_____